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Ms. Magalie Roman Salas
 Secretary
 Federal Communications Commission
 445 12th Street, S.W., TWA325
 Washington, DC 20554

Re: *Second Amendment to Petition for Rule Making*
Station KOCO-DT, Oklahoma City, Oklahoma

Dear Ms. Salas:

Transmitted herewith on behalf of Ohio/Oklahoma Hearst-Argyle Television, Inc., licensee of Television Station KOCO-TV, Oklahoma City, Oklahoma and permittee of Digital Television Station KOCO-DT, are an original and four copies of a Second Amendment to Petition for Rule Making requesting amendment of the DTV Table of Allotments, Section 73.622(b) of the Commission's Rules.

If any questions should arise during the course of your consideration of this matter, it is respectfully requested that you communicate with this office.

Sincerely,

BROOKS, PIERCE, McLENDON,
 HUMPHREY & LEONARD, L.L.P.

Mark J. Frank
 Counselor

Ohio/Oklahoma Hearst-Argyle Television, Inc.

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Before the
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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)

Amendment of Section 73.622(b))

DTV Table of Allotments)

Television Broadcast Stations)

MM Docket No. _____

RM- _____

To: Chief, Allocations Branch
Policy & Rules Division
Mass Media Bureau

SECOND AMENDMENT TO PETITION FOR RULE MAKING

On February 22, 1999, Ohio/Oklahoma Hearst-Argyle Television, Inc. ("Petitioner"), licensee of Television Station KOCO-TV, Oklahoma City, Oklahoma and permittee of Digital Television Station KOCO-DT filed a Petition for Rule Making ("Petition") requesting the Commission to amend Petitioner's DTV channel allotment from Channel 16 to Channel 7.

Attached hereto is an Amended Engineering Statement prepared by Bernard R. Segal, P.E. The amendment provides new supporting information based on the use of a revised directional

antenna radiation pattern for the proposed Channel 7 DTV operation. Petitioner respectfully requests that the Commission incorporate this amendment into its consideration of the Petition.

Respectfully submitted,

OHIO/OKLAHOMA HEARST-ARGYLE
TELEVISION, INC.

By: 

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September 21, 1999

Bernard R. Segal, P.E.
Consulting Engineer
Washington, DC

SUPPLEMENTAL ENGINEERING STATEMENT
PREPARED ON BEHALF OF
OHIO/OKLAHOMA HEARST-ARGYLE TELEVISION, INC.
OKLAHOMA CITY, OKLAHOMA

Ohio/Oklahoma Hearst-Argyle Television, Inc. (hereafter, Hearst-Argyle) has a petition pending to modify the DTV Table of Allotments to substitute Ch. 7 for Ch. 16 at Oklahoma City, Oklahoma for use for station KOCO-DT. The instant Supplemental Engineering Statement provides additional supporting information for the channel substitution.

The Ch. 16 reservation is for operation with maximum average effective radiated power of 1000 kW and antenna radiation center height above average terrain of 464 meters. According to the table in Appendix B of the Second Memorandum Opinion and Order on Reconsideration of the Fifth and Sixth Report and Orders, the digital television service that would be provided by station KOCO-DT operating pursuant to the Ch. 16 reservation is to 1,316,000 persons.

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Oklahoma City, Oklahoma

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The DTV coverage projection for KOCO-DT was based on replication of the KOCO-TV Grade B coverage. The KOCO-TV Grade B contour includes 1,317,000 persons. However, terrain losses and interference reduce the number of persons having available a noise-free, interference-free signal of Grade B or better strength to 1,234,000. The proposed Ch. 7 DTV operation will permit service to 1,265,000 persons with a noise-free, interference-free signal of 36 dBu, F(50,90) strength or better within the Grade B contour.

After the transition, it is Hearst-Argyle's intent to establish permanent KOCO-DT operation on the existing Ch. 5 with whatever power would be required to replicate or exceed its current Ch. 5 NTSC coverage, or on Ch. 7 in the manner described in the pending petition, if successful. Permanent operation on UHF Ch. 16 with a large effective radiated power would prove extremely expensive for initial capital costs and for continuing operational costs compared with a VHF installation.

Given the cost for implementing a high powered facility on Ch. 16 that replicates the current KOCO-TV Grade B service; the temporary nature of the operation; and the high operating costs compared with the costs for operation

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Oklahoma City, Oklahoma

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on a VHF channel, it makes little sense to expend vast sums of money and energy in implementing a high-powered facility on Ch. 16. If the pending petition to operate on Ch. 7 is unsuccessful, practical considerations dictate that the operation on Ch. 16 be reduced and only sufficient to meet FCC Rule requirements with a modest margin to assure satisfactory reception in the core market area.

The accompanying map, Figure 1S, shows two coverage contours for KOCO-DT. The contour shown in green is the coverage for a Ch. 16 facility that would provide somewhat greater than the minimum required service if the petition to substitute Ch. 7 for Ch. 16 does not succeed. The second contour on the map - the one in red - shows the coverage for the proposed Ch. 7 KOCO-DT operation.

As stated earlier, within the limits of the KOCO-TV Grade B contour, 1,265,000 persons would have available noise-free interference-free service on DTV Ch. 7. The contemplated Ch. 16 DTV interim facility would permit noise-free, interference-free service to 1,146,000 persons of the 1,317,000 persons within the KOCO-TV Grade B contour. Thus, as a practical matter, operation

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on Ch. 7 during the transition has the potential for serving 119,000 more persons within the Grade B contour than would be the case if KOCO-DT operated on Ch. 16 during the transition.

The public interest would be better served by KOCO-DT operation on Ch. 7 than on Ch. 16.

The FCC's FLR program was used for determining the noise-free, interference-free populations provided herein. The contours shown on the map of Figure 1S were calculated according to FCC procedures using the software program developed by EDX.

I declare under penalty of perjury that the foregoing is true and correct. Executed on July 28, 1999.

Bernard R. Segal, P.E.

Bernard R. Segal, P.E.

Figure 1S

